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Comments – Las Pilitas Quarry

General Comment: The proposed project is substantially in conflict with the nature of the area where it is proposed. This project includes unmitigated impacts to traffic, noise, air quality, etc and is not an essential resource considering the neighboring Hanson Quarry. The project as proposed is unacceptable and should be denied. Therefore the "No Project" alternative is clearly the most appropriate choice for this project.

However, the remaining comments are focused on mitigation measures that would make this project acceptable IF all are implemented. My comments will focus on Tables ES-1.

Table ES-1 – Lists potentially significant environmental impacts that can be fully mitigated to a level below significance. I disagree with the following conclusions made in this table.

1. AES-3: Nighttime Glare: The night sky in the project area is not significantly polluted by light currently. Astronomers (including the local astronomy group) and residents place a very high value on the night sky. Compliance with a County ordinance to prevent light pollution is not adequate. The standard for this project should be no light pollution permitted.
2. AG-2: Introduction of Invasive Species: Invasive species can have impacts well beyond the stated impacts to agriculture. Because the project is near a river and a highway, the potential for spreading invasives along these two features is substantial. To prevent spreading of invasives, this project should be required to do the following: A) Remove all invasive species from the quarry property before the quarry operation begins, B) Survey the Salinas River and Highway 58 for invasive species. C) Implement a long term monitoring plan to monitor the Quarry, Highway 58 and the quarry site for invasive species, D) Establish an invasive species remediation fund to ensure adequate funding of this mitigation measure throughout the life of the project.

3. AG-3: Dust Generation: Dust will be a bigger impact than the EIR indicates. A visit to other quarries and construction sites can easily demonstrate that dust is a much bigger problem than this EIR indicates. To mitigate dust, the roads throughout the quarry and haul route should either be paved our treated properly with a dust palative. Dust control within the quarry operation is likely to be nearly impossible to fully control, so a substantial amount of water will be needed (i.e., far more water than project by the EIR). The size of the active quarry operation should be decreased to also minimize dust. Dust monitoring equipment should be installed around the quarry to protect the local residents.
4. AQ-2b: Naturally Occurring Asbestos: The soils throughout the quarry should be tested and evaluated by a registered geologist to determine whether NOA is present. If NOA is present, the quarry should not become operational because it will be impossible to completely control NOA emissions from the quarry.
5. Bio-1, Bio-2, Bio-3, Bio-4, Bio-5, Bio-6, Bio-7, Bio-8, Bio-9 and Bio-10: Biological Impacts. All the listed impacts to biological resources are significant. This project warrants a fulltime environmental monitor who is not the employee for the quarry to monitor and protect biological resources. The Monitor needs to have the power to shut down the quarry operation when necessary to protect biological resources.
6. Bio-10: Effects on Wetland or Riparian Habitat: We should already know whether the "Seasonally Flooded Vernal Swale" is a wetland or riparian habitat. Why don't we? If it is a wetland, than it should be protected. If it can not be protected, then a mitigation wetland should be constructed. Retention basins are not adequate to function as wetland or riparian impact mitigation. Also, the Regional Water Quality Controlled Board should be consulted regarding wetland and riparian impacts.
7. Geo – 3: Soil Erosion and Loss of Topsoil: All top soil removed from the quarry site must be maintained to preserve the soil's biological characteristics until it is needed for reclamation. Protecting the soil from wind and rain is critical preserve this resource. Simply stockpiling topsoil will not preserve this resource adequately.
8. Geo-4: Changes in Surface Runoff and Drainage Patterns: Although I agree that retention basins are needed for this project, the project needs to be carefully evaluated for changes in water and sediment runoff that could affect downstream waterways. When the retention basins overflow, the water leaving these basins could cause significant erosion as its discharged (i.e., this water could be "hungry" because it is relatively clean). Changes in the fluvial geomorphology of the creek and the Salinas River downstream need to be investigated.
9. Haz-2: Release of Hazardous Materials or Waste: This section of the EIR is missing a list of regulatory requirements.
10. LU-2: Compatibility with Land Uses in the Santa Margarita Community: This project is not compatible with the community as proposed. Specifically, the project impacts: bicycling on Highway 58, increases truck traffic to an unacceptable level, endangers children going to and from school, diverts traffic into residential areas, increase noise and

air pollution. These impacts are not adequately mitigated. One solution would be to route the quarry trucks through the Hanson quarry. Another solution would be to construct a new road east of the Elementary School, if possible.

11. WQ-1: Alteration of Runoff Water: From my experience at other quarries and similar type projects, the impacts to water quality are more significant than discussed in this EIR. Over time, the quarry operators will cut corners to save money and time. To mitigate this deficiency, a water quality monitor should be hired to inspect the operation at least weekly to ensure no impacts to surface and groundwater occur. This WQ monitor should not be the employee of the Quarry and should have the power to shut down the operation if warranted.
12. WQ-2: Alteration of Groundwater: In addition to septic discharges threatening groundwater, the retention basins do as well. Unless the retention basins are lined, any contaminates that flows into these basins could migrate to groundwater. The water in the retention basins should be monitored at least monthly.

Traffic Study: I attempted to review the Traffic Study included with the EIR, but I could not. The primary reason is that it contains variables that are not defined. The Traffic study needs to be rewritten so lay people can understand it. The traffic study appears to substantially be downplaying the impacts of the proposed truck traffic.

Conclusion: Again I find that the only acceptable alternative is the "No Project" alternative. If this project were to be significantly decreased in size (land area, production and maximum truck traffic) and ALL the mitigation measures I proposed above were implemented, ity may be appropriate to re-propose this project.

Thank you for the opportunity comment.

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